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16 **UNITED STATES DISTRICT COURT**
17
18 **DISTRICT OF NEVADA**

19 NAVAJO HEALTH FOUNDATION – SAGE
20 MEMORIAL HOSPITAL, INC. (doing
21 business as “Sage Memorial Hospital”); an
22 Arizona non-profit corporation,

23 Plaintiff,

24 Case No. 2:19-cv-0329-GMN-EJY

25 vs.

26 RAZAGHI DEVELOPMENT COMPANY,
27 LLC; a Nevada limited liability company
28 (doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO FILE
AMENDED COMPLAINT AND FOR
DEFENDANTS TO FILE REPLY TO
PLAINTIFF’S OPPOSITION TO
DEFENDANTS’ MOTION FOR RULE 11
SANCTIONS**
(SECOND REQUEST)

1 Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of
2 Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit
3 Plaintiff additional time, to and until May 11, 2022, to file an Amended Complaint in
4 compliance with the Court’s Order filed on March 30, 2022. ECF No. 178. Additionally, the
5 parties agree to permit Defendants, to and until May 31, 2022, to file a reply to Plaintiff’s
6 opposition (ECF No. 183) to Plaintiff’s motion for FRCP 11 sanctions (ECF No. 174).

7 Presently, Plaintiff is expected to file an Amended Complaint on or before April 29,
8 2022 and Defendants are expected to file a reply brief on May 20, 2022. *See* ECF No. 187.
9 This is the parties second request for an extension of time for the reasons cited herein.

10 In support of this Stipulation, the parties rely upon the following:

11 1. Counsel for Plaintiff have been diligently working on drafting and finalizing an
12 Amended Complaint. However, part of that process requires verification and investigation of
13 certain facts. To that end, counsel for Plaintiff need to speak with certain witnesses and
14 coordinate respective schedules in order to do so. One of those witnesses has been, until
15 recently, unavailable due to other work commitments. The additional time requested herein will
16 permit counsel for Plaintiff to speak with appropriate witnesses and finalize the Amended
17 Complaint while at the same time meet other case commitments in unrelated cases.

18 2. Counsel for both parties respectfully request the Court approve this Stipulation and
19 permit the following:

20 a. Plaintiff shall file an Amended Complaint on or before May 11, 2022;
21 b. Defendants shall file a reply to Plaintiff’s opposition to the FRCP 11 motion on
22 or before May 31, 2022.

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1 The parties respectfully request the Court approve this Stipulation.

3 | /s/ Kris Leonhardt

/s/ Paul S. Padda

4 Pavneet S. Uppal, Esq.
5 Kris Leonhardt, Esq.
6 Jeffrey D. Winchester, Esq
Counsel for all named Defendants

7 | Dated: April 27, 2022

Kathleen Bliss, Esq.
Paul S. Padda, Esq.
David Stander, Esq.
Douglass A. Mitchell, Esq.
*Counsel for Plaintiff,
Counterdefendant and Third-Party
Defendants*

Dated: April 27, 2022

IT IS SO ORDERED:

Elayna J. Zouachah
UNITED STATES MAGISTRATE JUDGE

DATED: April 27th, 2022